

**IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

Stanley Simmons,

*Plaintiff,*

vs.

Civil Action No. 2:19-cv-425-DCN-BM

Dorchester County Detention Center;  
Dorchester County Sheriff L.C.  
Knight In His Official Capacity;  
South Carolina Commission on  
Indigent Defense and Office of  
Indigent Defense; Summerville Police  
Department; and, John Does 1-10,

*Defendants.*

**PLAINTIFF'S ANSWERS TO LOCAL RULE 26.01 INTERROGATORIES**

THE PLAINTIFF, above-named, by and through their undersigned Counsel of Record, hereby answers Federal Local Rule 26.01 Interrogatories as follows:

- A. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

**Answer: Plaintiff is unaware of any such claim(s). To the extent necessary, Plaintiffs reserve the right to supplement their responses to this request.**

- B. As to each claim, state whether it should be tried jury or non-jury and why.

**Answer: Non-Jury. This is an action at law for damages, however, Plaintiff waives their right to a trial by jury of this matter.**

C. State whether the party submitting these responses is a publicly-owned company and separately identify: (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent and (3) each publicly-owned company which the party owns ten percent (10%) or more of the outstanding shares.

**Answer: No / Not applicable.**

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

**Answer: The acts or omissions giving rise to the claim(s) asserted within the Complaint occurred in the Charleston Division.**

E. Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal?

**Answer: Upon information and belief, no.**

F. If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

**Answer: This interrogatory is more appropriate for the Defendant. To the extent a response from Plaintiffs is required, Plaintiffs would assert that the Defendant has been correctly named.**

G. If you contend that some other person or legal entity is, in whole or in apart, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

**Answer: Upon information and belief, the only party which Plaintiffs contend are liable is the named Defendant. However, Plaintiffs**

**reserve the right to supplement their response to this request if /  
when other liable parties may become known to Plaintiffs.**

Respectfully submitted this **13th** day of **February, 2019**:

**By:**

**SLOTCHIVER & SLOTCHIVER, LLP**

/s/ Andrew J. McCumber, Esq.

**Andrew J. McCumber, Esq.**

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